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NVL's

HEALTH AND SAFETY PLAN

(HASP)

for the

Rainier Common's

Exterior Paint Removal Project

NVL Laboratories
4708 Aurora Ave North
Seattle WA 98103

NVL Project #: 2012-494

Version Date: January 8, 2020

The HASP is to be reviewed and updated by the CIH minimally after completion of an IPWP (Individual Phase Work Plan) and more frequently if the work changes. Updates are done as new tasks are implemented. The latest version date is posted at the NVL construction site office.



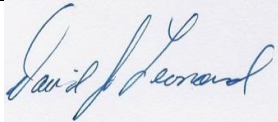

HEALTH AND SAFETY PLAN APPROVAL

NVL Laboratories (NVL) developed this Health and Safety Plan (HASP) for its use. NVL claims no responsibility for its use by others. This plan covers activities with the potential for exposure to hazardous materials during activities associated with the project.

The Contractor at the Site will have a HASP in operation at the site. The intent is to follow the procedures documented in the Contractor's HASP with NVL's HASP providing specifics and clarity for NVL operations.

With this said, NVL's HASP is written for the specific site conditions, purposes, dates, and personnel specified and must be amended as described in the document, particularly if conditions change. It is recognized that this is a living document and will be continuously improved and updated during the course of the project. At a minimum, this HASP is to be reviewed and updated by the CIH minimally every six months and more frequently if the work changes. Updates are done as new task are implemented. As a result, even though initially approved as signed below, it is critical that the latest version of the HASP is used. The latest version date is kept at NVL's site office.

The HASP is not intended to address normal safety practices on the construction site or NVL's standard operating procedures that are covered in the Washington State Department of Labor and Industries Safety Standards for Construction Work (WAC 296-155).

PLAN PREPARED BY:	
	January 8, 2020
David Leonard, CIH	Date
	January 8, 2020
Munaf Khan, NVL President	Date

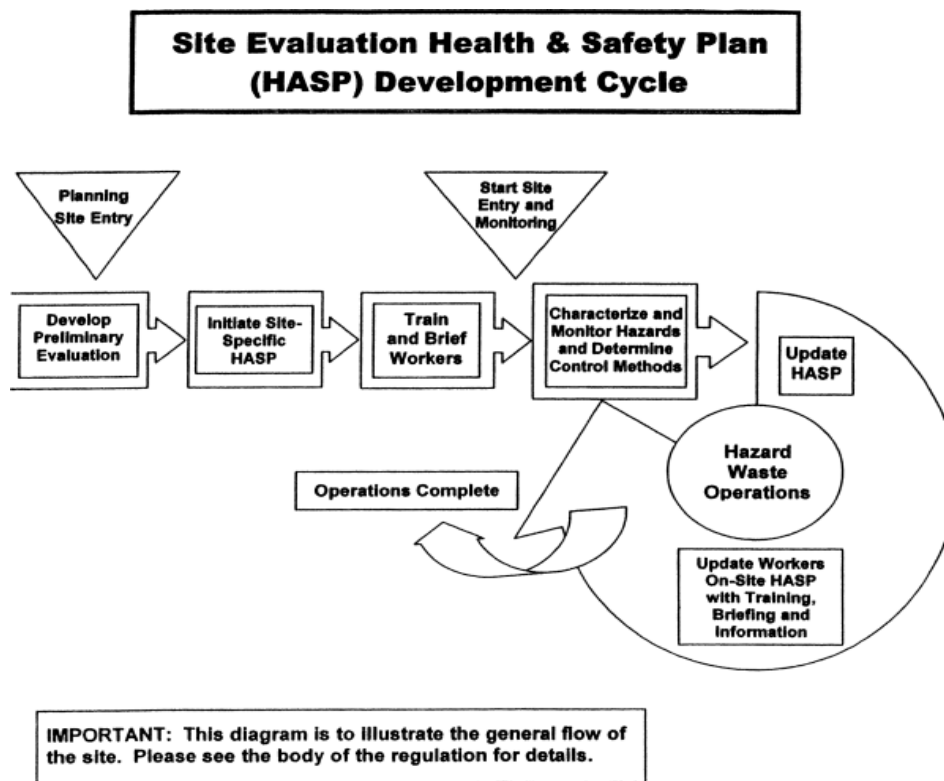
PROJECT CONTACTS AND EMERGENCY INFORMATION	
SITE LOCATION:	3100 Airport Way South Seattle, WA 98134
NVL JOBSITE ADDRESS:	3100 Airport Way South Seattle, WA 98134
NVL LABORATORIES, INC. (NVL) KEY PERSONNEL HEALTH AND SAFETY <ul style="list-style-type: none"> SITE SAFETY OFFICER 	NVL Laboratories, Inc. (NVL) 4708 Aurora Ave. N. Seattle WA 98103 Office: Phone: (206) 547-0100 Fax: (206) 634-1936
	Munaf Khan Project Manager/Laboratory Directory/President CELL: (b) (6) E-mail: Munaf.K@nvlabs.com
	Dave Leonard MSPH CIH Certified Industrial Hygienist (CIH) CELL: (b) (6) E-mail: catalystnw@comcast.net
	Marcus Gladden Site Safety Officer / Industrial Hygienist CELL: (b) (6) E-mail: Marcus.G@nvlabs.com
Project Site KEY PERSONNEL	Doug Lansing Construction and Facilities Manager Rainier Commons, LLC Project Manager : Rainier Commons CELL: (b) (6) E-mail: (b) (6)
NEAREST HOSPITAL:	Harborview Medical Center 325 Ninth Avenue Seattle, WA 98104-2499 General Information: 206-744-3300 Emergency Department: 206-744-3074 Urgent Care, 206-744-5867
EMERGENCY FIRE AND AMBULANCE:	Call 911

<u>EMERGENCY PROCEDURES</u>	
Emergency Phone Number	Call 911 for POLICE / FIRE / MEDICAL AID
Jobsite Address:	3100 Airport Way South Seattle, WA 98134
NEAREST HOSPITAL: (Map with directions on next page)	Harborview Medical Center 325 Ninth Avenue Seattle, WA 98104-2499 General Information: 206-744-3300 Emergency Department: 206-744-3074 Urgent Care, 206-744-5867
FIRST AID KIT LOCATIONS	NVL Construction Site Office
SITE EVACUATION	In the event of an emergency situation such as fire, explosion, or significant release of toxic gases, project personnel in the field will be directed to evacuate the area. In the event of an emergency, personnel will gather at their pre-determined meeting point for a head count. The meeting point is in front of the Coffee Shop (West Side). This location (or any change) will be communicated to the work crew(s) during the safety briefing prior to commencement of work activities and weekly thereafter.

1.0 INTRODUCTION

This site specific Health and Safety Plan (HASP) provides a general description of the levels of personal protection and safe operating guidelines expected of each NVL employee or subcontractor associated with the work being conducted under the control of Rainier Commons during the Exterior Paint Removal project.

It is recognized that this is a living document and will be continuously improved and updated during the course of the project. As described and shown in the following diagram from WAC 296-843-100, characterization and analysis of site hazards is an ongoing process:



In order to do this, HASP supplements will be generated as necessary to address any additional activities or changes in site conditions which may occur during field operations. Once generated, each Supplement will be reviewed and acknowledged by NVL, communicated to field personnel prior to the start of applicable work activities and appended to this HASP.

At a minimum, this HASP is to be reviewed and updated by the CIH minimally every six months and more frequently if the work changes. Updates are done as new task are implemented. As a result, even though initially approved as signed below, it is critical that the

latest version of the HASP is used. The latest version date is kept at the NVL construction site office.

1.1 GENERAL

The provisions of this HASP are mandatory for all NVL personnel engaged in fieldwork associated with the Rainier Commons Exterior Paint Removal project. A copy of this HASP, any applicable HASP Supplements and applicable NVL safety documents shall be maintained on site and available for review at all times. Record keeping will be maintained in accordance with this HASP.

In the event of a conflict between this HASP and federal, state, and local regulations, workers shall follow the most stringent/protective requirements.

1.2 SCOPE OF HEALTH AND SAFETY PLAN

This HASP covers specific site activities that will be conducted by NVL personnel and their subcontractors.

Site Investigation and Monitoring

Activities include, but are not limited to: the industrial hygiene and safety sampling and testing for air contaminants and material testing by NVL personnel in support of HASP activities. Other site investigation activities not specifically listed here will be covered by Health and Safety Supplements, which will be appended to this HASP as needed.

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1.3 PURPOSE OF THE SITE SPECIFIC HASP

The information in this HASP has been developed in accordance with applicable standards and the project specification and is, to the extent possible, based on information available to date and is tailored to be site specific. The HASP is a living document and is to be constantly updated as conditions and knowledge of the work activities develop.

1. This site specific *Health and Safety Plan* (HASP) is required in the specification for the project to identify, evaluate and control safety and health hazards.
2. Also, as part of this project, NVL provides support to Rainier Commons with health and safety services, including an experienced Certified Industrial Hygienist to perform the duties of identifying and taking immediate actions to correct hazards found during the course of the project.

3. NVL's duties per this HASP is to assess safety hazards, conduct exposure monitoring and interpret laboratory data to provide the professional industrial hygiene, safety and laboratory services needed to support operations and assure compliance with Environmental and Health and Safety regulations

1.4 HASP REQUIREMENTS

The HASP includes the following requirements:

- **Communication** the contents of this HASP to all NVL personnel, subcontractors, and visitors at the site, which includes at a minimum an initial briefing regarding health and safety procedures. During the briefing, employees shall be instructed on the following topics:
 - The nature of the hazardous materials at the site and the controls in place
 - The atmospheric monitoring program and equipment
 - Action levels and requirements, if exceeded
- **Elimination of unsafe conditions**, i.e. efforts to identify conditions that can contribute to an incident and to remove exposure to these conditions.
- **Frequent inspections**, i.e. regular documented safety inspections of the work area, materials, and equipment by qualified persons to ensure early detection of unsafe conditions. Safety and health deficiencies shall be corrected as soon as possible or project activities shall be suspended. Documentation of daily inspections and corrective actions are to be kept with the project files.
- **Scheduled formal review and update of the HASP.** To ensure this HASP maintains compliance with regulatory and specification requirements, and is serving its purpose to protect people and the environment, this HASP is to be reviewed and updated by the CIH minimally after completion of an IPWP (Individual Phase Work Plan) and more frequently if the work changes. Updates are done as new task are implemented. As a result, even though initially approved as signed below, it is critical that the latest version of the HASP is used. The latest version date is kept at the NVL construction site office.

1.5 APPLICABLE REGULATIONS

Safety and Health Requirements for Hazardous Waste Operations, since the work being conducted involves operations impacting hazardous waste at a site regulated by the Resource Conservation and Recovery Act of 1976 (RCRA) the applicable regulations includes WAC 296-843-100 for Hazardous Waste Operations.

2.0 PROJECT HEALTH AND SAFETY ORGANIZATION

PROJECT MANAGER

The Project Manager (PM) has overall management authority and responsibility for all NVL site operations, including safety. The PM will provide the site supervisor and NVL with the necessary work plans, staff and budgetary resources which are appropriate to meet the safety needs of the project operations.

PROJECT SITE SUPERVISOR

The Site Supervisor (SS) has the overall responsibility and authority to direct NVL work operations at the job site according to the provided work plans, this HASP and applicable THAs (Task Hazard Analysis forms). This includes:

- Discussing deviations from the work plan with the PM.
- Discussing safety issues with the PM and field personnel.
- Assisting with the development and implementation of corrective actions for site safety deficiencies.
- Assist the with the implementation of this HASP and ensuring compliance.
- Assist the with inspections of the site for compliance with this HASP.

At this project, the competent person for NVL is the SS who the Department of Labor and Industries (L&I) regulations define a "competent person" as one who is capable of identifying existing and predictable hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them.

NVL's INDUSTRIAL HYGIENE AND SAFETY SUPPORT

For this project NVL Laboratories (NVL) provides the professional industrial hygiene, safety and laboratory services needed to assess safety hazards, conduct exposure monitoring and interpret laboratory data to support operations and assure compliance with Environmental and Health and Safety regulations.

EMPLOYEES

Employee Responsibilities

Responsibilities of employees associated with this project include, but are not limited to:

- Understanding and abiding by the policies and procedures specified in the HASP and other applicable safety policies, and clarifying those areas where understanding is incomplete.

- Providing feedback to the NVL relating to omissions and modifications in the HASP or other safety policies.
- Notifying NVL of unsafe conditions and acts.

Employee Authority

The health and safety authority of each employee assigned to the site includes the following:

- The right to refuse to work and/or stop work authority when the employee feels that the work is unsafe (including subcontractors or team contractors), or where specified safety precautions are not adequate or fully understood.
- The right to refuse to work on any site or operation where the safety procedures specified in this HASP or other safety policies are not being followed.
- The right to contact NVL at any time to discuss potential concerns.

3.0 SITE HAZARDS

The project is to remove exterior paint that is known to contain PCBs. The methods to be used by the Contractor to remove the paint include abrasive blasting and chemical removal.

Other hazards also exist at the site and are categorized as construction hazards.

4.0 SITE CONTROL

GENERAL

The purpose of site control is to minimize potential contamination of workers and protect the adjacent area from the site hazards.

Controlled work areas will be established at each work location, and if required, will be established directly prior to the work being conducted. Diagrams designating specific controlled work areas will be provided the Contractor, posted in the support area and discussed during the daily safety meetings. If the site layout changes, the new areas and their potential hazards will be discussed immediately after the changes are made.

5.0 SAFE WORK PRACTICES

STOP WORK AUTHORITY

- **Project Manager and Site Safety Officer**

The PM and SS have the ultimate responsibility and authority to stop work if they determine if workplace conditions present an uncontrolled risk of injury or illness to employees. Resumption of safe operations is the primary objective AND operations shall not resume until NVL has concurred that workplace conditions meet acceptable safety standards.

- **Employees**

All employees have the right and duty to stop work when conditions are unsafe and to assist in correcting these conditions.

6.0 TRAINING

HAZWOPPER training is required for workers at the site.

The CIH will work with PM to identify if additional training is required. Topics for training may include:

- **HASP training**

Instruction on the contents of applicable portions of this HASP and any supplemental health and safety information developed for the tasks to be performed, including:

- Information about the potential routes of exposure, protective clothing, precautionary measures, and symptoms or signs of chemical exposure and heat stress.
- Awareness of task-specific physical hazards and other hazards that may be encountered during site work. This includes any specific required training for health and safety.
- Awareness of emergency and evacuation procedures.

- **Personal Protective Equipment (PPE)**

- **Respiratory Protection**

- **Hazard Communication Program**

7.0 PERSONAL PROTECTIVE EQUIPMENT

NVL's existing Personal Protective Equipment (PPE) procedures/program will be followed at this site, which includes training in its use.

Priority for control of site hazards will be eliminated or reduced to the greatest extent possible first through administrative and/or engineering controls along with safe work practices prior to relying on personal protective equipment. The goal, if PPE is used, is that it is as a back-up if the other controls are ineffective.

General Information about Personal Protective Equipment		
Type	Material	Information
Safety Vest	High Visibility	Must be visible from all sides
Boots		
Safety Glasses		ANSI Approved
Hearing Protection	Ear Plugs and/or Muffs	When in noisy environments
Gloves	Any	When working with sharp objects or powered equipment
Protective chemical gloves	Inner: Best Safety N-DEX Outer: Heavy duty Nitrile, PVC, Neoprene, and Viton	When in contact with potentially contaminated materials
Protective Chemical Overalls	Tyvek	When clothing may contact contaminated materials
Protective Chemical Boots	Rubber, Neoprene, PVC	If needed
Level C Respiratory Protection	Full Face Respirator	If in containment
Face shield	Debris/splash shield	If needed
Cold weather gear	Hard hat liner, hand warmers, and insulated gloves	If needed

8.0 GENERAL SAFETY AT THE SITE

Smoking, Eating, or Drinking

Smoking, eating and drinking will not be permitted inside any controlled work area at any time. Field workers will first wash hands and face immediately after leaving controlled work areas (and always prior to eating or drinking).

Personal Hygiene

The following personal hygiene requirements will be observed:

- **Water Supply:** A water supply meeting the following requirements will be utilized:
- **Potable Water** - An adequate supply of potable water will be available for field personnel consumption. Potable water can be provided in the form of water bottles, canteens, water coolers, or drinking fountains. Where drinking fountains are not available, individual-use cups will be provided as well as adequate disposal containers. Potable water containers will be properly identified in order to distinguish them from non-potable water sources.
- **Non-Potable Water** - Non-potable water may be used for hand washing and cleaning activities. No potable water will not be used for drinking purposes. All containers of non-potable water will be marked with a label stating:

***Non-Potable Water
Not Intended for Drinking Water Consumption***

Buddy System

All field personnel will use the buddy system when working within any controlled work area. Personnel belonging to another organization on site can serve as "buddies" for NVL personnel. Under no circumstances will any employee be present alone in a controlled work area.

Heat and Cold Stress

Heat and cold stress may vary based upon work activities, PPE/clothing selection, and weather conditions. To reduce the potential of developing heat/cold stress, be aware of the signs and symptoms of heat/cold stress and watch fellow employees for signs of heat/cold stress.

9.0 RECORDKEEPING

Records shall established and maintained of all necessary and prudent monitoring activities as described in the appendices.

Copies of air sampling results will be maintained in the project files.